UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS	**Civ. No. 19-md-2875**
THIS DOCUMENT RELATES TO ALL CASES	

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION OF TEVA WITNESS MICHELLE KELLER

TO: **Lori G. Cohen, Esq,**
GREENBERG TRAURIG, LLP
Terminus 200, 3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305

Attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries, Ltd., Actavis, LLC, Arrow Pharm Malta Ltd., and Actavis Pharma (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of **Michelle Keller**, on August 27, 2024, at 10:00 a.m. eastern time, via remote deposition while the witness is at Morgan Lewis, 502 Carnegie Center, Princeton, NJ 08540, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition

shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

David J. Stanoch, Esq. and/or Taylor M. Bacques, Esq.
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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: August 19, 2024

FOR PLAINTIFFS

By: /s/ David J. Stanoch
David J. Stanoch
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701 Camp St.
New Orleans, LA 70130
Telephone: 504-524-5777
d.stanoch@kanner-law.com

EXHIBIT A

RULE 30(B)(6) TOPICS (*see* original Notie for All Topics to Teva)[1]

32. Your oral and written communications with any person or entity, including but not limited to Your API and Finished Dose customers, with regard to the manufacturing process, and any changes to the manufacturing process, for Your API.
33. Your oral and written communications with any person or entity, including but not limited to Your API and finished dose customers, with regard to the manufacturing process, and any changes to the manufacturing process, for Your Finished Dose.
34. Your oral and written communications with its API Customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the Your API.
35. Your oral and written communications with its finished dose customers or other downstream entities (i.e., wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the Your Finished Dose.
36. Your oral and written statements (defined to include representations and warranties) to finished dose manufacturers, repackagers, relabelers, wholesalers, retailers, and consumers with regard to the contents, quality, and purity of Your API.
37. Your oral and written statements (defined to include representations and warranties) to finished dose manufacturers, repackagers, relabelers, wholesalers, retailers, and consumers with regard to the contents, quality, and purity of Your Finished Dose.
38. Your product recall for Your API including who communicated with, how, about what, and the retention of recalled or sequestered API.
39. Your product recall for Your Finished Dose, including who You communicated with, how, about what, and the retention of recalled or sequestered finished dose.

[1] Ms. Keller will address these topics to the extent they pertain to communications with downstream customers and Teva's finished dose product, while Ms. Ebejer will address these topics on another date to the extent they pertain to communications with Teva's API supplier and Teva's API incorporated into the at-issue losartan product. *See* 7/31/24 V. Lockard Ltr.

40. All credits, indemnification, refunds, and/or penalties paid or provided by or to You in connection with the nitrosamine contamination of Your API.
41. All credits, indemnification, refunds, and/or penalties paid or provided by or to You in connection with the nitrosamine contamination of Your finished dose.

45. How to match up each lot of API which contained any amount of nitrosamines to each Finished Dose pill manufactured from that lot or batch.
46. Tracing of batches and lots of Your API sold downstream and ultimately intended for use by consumers in the United States.
47. Tracing of batches and lots of Your finished dose sold downstream and ultimately intended for use by consumers in the United States.
48. The pricing of Your API that was ultimately sold in the United States, at each level of the supply chain.
49. The pricing of Your finished dose, per pill and per quantity, that was ultimately sold in the United States, at each level of the supply chain.
50. The gross and net profits to You from the sale of Your API in or for sale in the United States.
51. The gross and net profits to You from the sale of Your finished dose in the United States.
52. The quantity/units including pill counts of Your API sold in the United States.
53. The quantity/units including pill counts of Your API sold in the United States, and recalled or returned.
54. The quantity/units including pill counts of Your finished dose sold in the United States.
55. The quantity/units including pill counts of Your finished dose sold in the United States, and recalled and returned pills.
56. Your API sales and pricing data produced by you in this litigation (sample documents to be provided ahead of deposition during meet and confer process).
57. Your finished dose sales and pricing data produced by you in this litigation (sample documents to be provided ahead of deposition during meet and confer process).

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Michelle Osmian.

2. The complete production of Michelle Keller's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2024, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

FOR PLAINTIFFS

By: /s/ David J. Stanoch
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